

Jump, Christine

From: Michael Stephenson <mstephenson@cameron-cole.com>
Sent: Tuesday, January 13, 2015 1:32 PM
To: Jump, Christine; SMITH, MARTIN L
Subject: RE: Clean Harbors

Hello Chris,

My apologies for the delay in getting back to you as I have been pulling together the requested information from various people involved.

Let me see if I can clear things up with regard to your concerns.

Backfilling – I realize you have not received any confirmation results in some time. Our plan has always been to send to you the final confirmation soil sample results upon completion of each individual dig area. Our reasons for not sending you “interim” confirmation results is to avoid confusion later on. However, the dig areas we have been working on over the past several weeks are quite large (Bldg B + D + Process Area and Building C). Since we have not yet totally completed these excavations, we have been waiting to send you a comprehensive picture of what the final confirmation results look like. The excavation has been proceeding according to the procedures in the work plan (i.e. keep digging in the direction of any exceedance) and we have only backfilled those portions of these large excavations where IAOs have been achieved. The reason for backfilling these areas include encountering groundwater (backfill to prevent sloughing), dangerous conditions caused by a combination of winter conditions and steep sidewalls, creating access routes for equipment to other portions of the site and to accommodate the steady stream of backfill material being imported to the Site. We are very close to completing these excavations and will make every effort to get final confirmation results for these areas sent to you as soon as possible following completion.

With regard to the Coastal property excavation, the reason this hole will be backfilled immediately is that expansion of the excavation in any direction on the Coastal property will not be possible due to the presence of a work trailer to the south, the Coastal landfarm to the east, and an ongoing metal recycling operation to the west. We will collect confirmation soil samples from the excavation prior to backfilling, but any residual concentrations that exceed IAOs will need to be carried into the next step of the corrective action process. Further excavation beyond the area depicted in the work plan is simply not feasible.

To address the southerly extent of the paint can area, Geoprobe sampling will be performed at a later date. Insufficient room is present between the Fenceline and the pipeline to safely perform an excavation in this area, either for the purpose of sampling or further excavation. I am unsure of the timing of this additional sampling work, but likely can be combined with other well installation or investigation activities planned for late 1st quarter.

I will be sending you a sketch depicting the following in hopes of clearing up our progress

1. Planned excavation areas (from the workplan)
2. Actual excavated areas
3. Areas that have been backfilled already
4. Areas that have yet to be excavated but are planned

I hope to have the information needed to get this to you by tomorrow.

With regard to schedule, we are getting very close to being done with the IRM at this Site.

Today – Wednesday

RCRA



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1. Continue digging the paint pit area chasing gray material encountered at depth. While further excavation southward is not possible, the excavation is being expanded to the east, west and north to the extent possible to remove this material
2. Complete the Building C excavation.

Thursday – Friday

1. Complete the southwest Fenceline excavation on the Coastal property
2. Complete the excavation of the buried drum area in the Process Area
3. Complete the Building B excavation

Next Week

1. Return to the Northeastern corner and complete the re-excavation of this area according to the plan transmitted to you on 10/31/14.

Finally, Marty Smith continues to be the decision maker with regard to this IRM. Sometimes decisions regarding maintaining workplace safety need to be made in Marty's absence (as in determining when excavations need to be backfilled due to sloughing etc.) and we as a project team will try to improve our communication to you in cases where adjustments to the plan need to be made.

Please let me know if you have any further questions or concerns regarding our progress and I'll do my best to answer.

Thanks,

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From: Jump, Christine [mailto:Jump.Chris@epa.gov]
Sent: Monday, January 12, 2015 10:28 AM
To: Michael Stephenson; SMITH, MARTIN L
Subject: Clean Harbors

Mike and Marty-

The IRM work plan states that final confirmatory sample results will be submitted to EPA prior to backfilling, where possible. EPA has not been receiving confirmation samples for the excavations, several of which are being backfilled. Please submit this data as required by the work plan.

I spoke with Todd Weaver on Friday. In response to a question regarding the timing of the excavation, he told me the excavation on the former Coastal refinery property will

probably be immediately backfilled without waiting for results of sampling. This is different from the work plan and EPA should be notified of changes to the work plan if this is the plan.

Excavation of the "paint can pit" area is apparently limited to the south due to the petroleum pipeline. There has been discussion of delineating the extent of contamination associated with this SWMU either by "pot holing" on the south side of the pipeline, on the facility property or on the former refinery property, or by geoprobe samples at a future date. Please let me know which approach will be taken at the site.

The original schedule submitted for the IRM is no longer valid. Please submit a revised schedule for the remaining IRM activities.

Please clarify who is responsible for making decisions regarding implementation of the IRM at the site.

Please call me if you have any questions concerning this email.

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